

GENERAL POLICY: CHARITABLE DONATIONS AND FUNDRAISING

This policy is biennially reviewed to ensure compliance with current regulations

Approved/reviewed by	
Approved/Reviewed by: Chief Operating Officer	
Date of next review	September 2025

This policy and procedure is subject to The Equality Act 2010 which recognises the following Protected Characteristics: Age, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex, Sexual orientation and Disability

1. Document Control

1.1. Document Details

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1.2. Revision History

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1.3. Distribution

Name	Email	Organisation
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1. CHARITABLE DONATIONS INTRODUCTION

- 1.1 This policy has been developed as a guide on how Boston College as an exempt charity in England makes decisions on accepting and refusing charitable donations – setting out the criteria and factors on which these decisions will be based.
- 1.2 Its key purpose is to ensure that the reputation of our supporters (donors) and Boston College are protected from any real or perceived impropriety in the relationship that is established through the offer and receipt of a charitable donation.
- 1.3 In addition, this document highlights our commitment to carrying out fundraising that is legal, open, honest and respectful as set out by the Code of Fundraising Practice as published by the Fundraising Regulator.

2. SCOPE

- 2.1 The policy applies to all staff, students and volunteers including our Board of Governors. For the avoidance of doubt, charitable donations and philanthropic gifts are distinguished from funds received through public sources for example, ESFA, OFS. Public sources together with income generated from the College's commercial activity are not included within the scope of this policy.
- 2.3 Grants solicited from and received by charitable foundations operating within the UK are also exempt from this policy as long as such support does not contravene the acceptance and refusal criteria as defined at section four.
- 2.4 Charitable donations include, but are not exclusively limited to cash, cheques, property, shares, bonds, legacy gifts, tangible personal property (gifts in-kind), corporate sponsorships and gifts from charitable foundations.
- 2.5 This policy has been drafted to complement existing Boston College policies including: Financial Regulations, Bribery Act 2010 Policy and Compliments, Concerns & Complaints Policy.

3. ACCEPTANCE AND REFUSAL CRITERIA – GUIDING PRINCIPLES

- 3.1 As highlighted within section one, this policy has been developed to ensure that both our supporters (donors) and the College are protected through the relationship that is established through the offer and receipt of charitable donations
- 3.2 Although the ultimate responsibility lies with the Corporation, on a day-to-day basis this is delegated to the Principal and Chief Executive supported by ELT.
- 3.3 All charitable donations being offered to the College will be recorded appropriately and any donation that could potentially cause concern or raise questions as to why it has been accepted or refused will be referred to the Finance and Resources Committee who will make recommendations to the Corporation.

- 3.4 The key decision points, together with any additional information and the procedure that was followed will be presented to the Corporation to make a final recommendation. In the instance of a donation not being accepted this will be communicated to the donor within five working days of the Corporation's decision.
- 3.5 In order to establish whether it would be in the best interests of Boston College to accept or refuse a charitable donation the following criteria will be taken in to consideration:
- Does the donation contribute towards the overall mission, values and strategic aims of Boston College?
 - Can the College successfully deliver the agreed activity and advance its mission under the conditions relating to the donation, such as schedule of payments, required co-funding if any, reporting requirements and other legal aspects of the contract?
 - Are the supporter's (donor's) objectives or activities incompatible with our vision, mission and values?
 - In accepting the donation, is there a risk of causing significant damage to the integrity, public image or professional reputation of the College?
 - Could the timing of a donation be construed as having influenced (for example) an academic outcome or procurement process?
- 3.6 Boston College will, therefore, not accept charitable donations in the following circumstances:
- Was known to be associated with criminal sources/illegal activity/corruption;
 - Would help further the donor's personal objectives, which conflict with those of Boston College;
 - Would impact adversely on Boston College's reputation and conflict with the College's mission and Charitable status
 - Has the potential to damage and/or risk relationships with partners, other supporter/donors and our stakeholders.
 - Incur or is likely to incur on-going costs that cannot be met or demonstrated to be met from existing resources.
- 3.7 It should also be noted that Boston College recognise that perceptions of what is acceptable and factors affecting reputations may change over time. In the acceptance of charitable donations, the College will act in good faith according to the standards prevailing at the time of receipt.

4. COMPLAINTS – FUNDRAISING

- 4.1 Boston College is committed to providing high-quality customer services. We value complaints and use the information from them to help improve our services.
- 4.2 Any third party complaints about the College's fundraising activity will be addressed through the College's existing Compliments, Concerns and Complaints procedure which is clearly set out in our Compliments, Concerns and Complaint's Policy information which is available on our website.

5. **MONITORING AND REVIEW**

- 5.1 This policy will be fully reviewed every two years or more frequently should legislative requirements change.

6. **FUNDRAISING**

Fundraising activities will be recognised so long as they are in line with Boston College's strategic mission and objectives. Fundraising by staff or learners must be approved in advance (see below).

Other fundraising by external bodies will be recognised, although such bodies will be encouraged to advise the College of their intentions and be guided by the College.

6.1 **Approval for Funding:**

All fundraising by College staff or learners should be approved before it commences, according to the following criteria:

All fundraising inside (e.g. sale of donated goods) or outside the College, (e.g. collections outside college premises, appeals to the media or industry), must be approved by the Principal and Chief Executive Officer and / or the Chief Operating Officer regardless of the sum involved and will report such approvals to the Corporation.

In the event a member of college staff becoming aware of an external body fundraising on behalf of the college, he/she should notify the Chief Operating Officer so that the fund raising can be approved (if this has not already occurred) and the College can formally accept the donated cash or equipment.

Submissions for approval of fundraising (whether by members of staff or external bodies) should include the following detail:

- Scheme for which funds are to be raised;
- How the funds will be raised (collections, raffles, appeal, etc);
- Capital cost of the scheme;
- Revenue cost of the scheme;
- Proposed source of funding if any cost additional to that covered by fundraising;
- For equipment; proposed source of eventual replacement and timescale.
- Any necessary Risk Assessments carried out
- Timescale
- Insurance

Curriculum area enterprise projects linked to curriculum objectives may fall outside the remit of this policy, but staff should talk to the Chief Operating Officer and / or the Head of Finance to ensure college financial procedures are maintained. This will apply to small scale fundraising ventures, e.g. Support for an external charity.

6.2 Funds Raised:

- All staff, learners or volunteers carrying out fundraising activities are expected to act with fairness, honesty, integrity and openness
- All funds received must be given to the Finance Office to be recorded, counted and banked (two people must be present when counting funds) in line with the College Financial Regulations
- Fundraisers must not exploit their position for personal gain
- Fundraisers shall adhere to all policies and procedures adopted by the Governing Body. Donors have the right to obtain complete and timely information on how their funds are used
- All funds raised will be used for the purpose for which they were raised and within a set timeframe
- In case of a cancellation of event; donors will be informed and they must agree to a change of use of funds or change of timescale or return to donor
- Publicity and promotional activities are to be truthful and non-deceptive with a clear statement of use.

The Fundraising Policy represents a commitment to the highest standards of good practice and ensures that all fundraising activities are open, legal and fair.

Anyone having concerns regarding the colleges fundraising schemes should discuss these initially with the Chief Operating Officer. The Chief Operating Officer will report regularly to the Corporation regarding all fundraising issues.

APPENDIX ONE

Definition – Sponsorship vs Donation

When working with external organisations/businesses in relation to fundraising it is important to understand the difference between a sponsorship offer and a donation to ensure both parties (ie the College and the external organisation/business) know what type of offer is being made and the outcome from this.

Sponsorship - is a cash or in-kind fee supplied to an organisation or group in return for access to commercial potential associated with that organisation. Sponsorship is more high profile and usually undertaken for the purpose of achieving commercial objectives. It involves a clear, tangible business benefit for the sponsor.

Donations – these should be given with no expectation of commercial benefit and undertaken with a philanthropic intent for example to support a particular group, theme, area. Donations should have no direct commercial incentives. Donations can include for example – money, equipment and time.

General Principles – Procurement

If the organisation offering the sponsorship/donation is not a 'supplier' (i.e. they do not sell goods/products/services which the College would or could otherwise normally purchase) then generally the offer of sponsorship/donation could be considered for acceptance – based on the criteria set out within acceptance policy.

If, however, the organisation offering the sponsorship/donation is classed as a 'supplier' (whether they currently supply the College or not), then generally such offers should be considered as a procurement relationship.